

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

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Chapter 11

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,¹

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:
:
Case No. 20-12345 (SCC)

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:
:
Debtor.

**JOINT STIPULATION AND [PROPOSED] ORDER
EXTENDING THE TIME TO FILE NOTICE OF REMOVAL OF CIVIL ACTION**

WHEREAS, on October 1, 2020, The Roman Catholic Diocese of Rockville Centre, New York (the “Diocese”), the debtor and debtor in possession in the above-captioned chapter 11 case, commenced an adversary proceeding (the “Adversary Proceeding”) by filing its *Verified Complaint for Declaratory and Injunctive Relief* [Adv. Docket No. 1] (the “Complaint”) against certain individuals; and

WHEREAS, on October 1, 2020, the Diocese also filed its *Motion for Preliminary Injunction Under Sections 362 and 105(a) of the Bankruptcy Code* [Adv. Docket No. 2] pursuant to which the Diocese seeks a preliminary injunction of the further prosecution of the State Court Actions against the State Court Defendants (as such terms are defined therein) pursuant to 11 U.S.C. §§ 105(a) and 362(a) and Federal Rule of Bankruptcy Procedure 7065; and

WHEREAS, a civil action was commenced against St. Hugh of Lincoln Roman Catholic Church, a parish within the Diocese, on October 1, 2020, and is now pending in New York state court, styled *Davidson v. St. Hugh of Lincoln*, Index No. 6141620/2020 (Sup. Ct. Suffolk Cty.) (the “Action”).

¹ The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue P.O. Box 9023, Rockville Centre, NY 11571-9023.

NOW, WHEREFORE, the parties hereby stipulate and agree as follows:

1. The time period by which St. Hugh of Lincoln Roman Catholic Church may file a notice of removal with respect to the Action pursuant to 28 U.S.C. § 1452 and Federal Rule of Bankruptcy Procedure 9027(a)(3) is extended through and including December 18, 2020.
2. This stipulation is without prejudice to St. Hugh of Lincoln Roman Catholic Church's right to request a further extension of time to file a notice of removal of the Action.
3. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this stipulation.
4. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this stipulation.

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STIPULATED AND AGREED TO BY:

JONES DAY

PATRICK F. ADAMS

By: /s/ Corinne Ball
Corinne Ball
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-and-

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*Proposed Attorneys for the Debtor and
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Counsel to Plaintiff

SO ORDERED:

New York, New York
Dated: October __, 2020

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE